



February 15, 2017

Federal Communications Commission  
445 12<sup>th</sup> Street S. W.  
Washington, D.C. 20554

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Received & Inspected  
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FCC Mail Room

RE: Comment to Mobilitie's petition for Declaratory Ruling on streamlining deployment of small cell infrastructure by providing wireless facilities siting policies; WT Docket no. 16-421

Dear FCC Representative,

This letter is to provide comment on behalf of the City of Edina regarding Mobilitie's recent FCC Petition for Declaratory Ruling. Presently, the City of Edina has a set procedure for permitting telecommunication companies to use public right of way (ROW).

Upon hearing throughout the industry that small cell sites were arriving, the City of Edina amended its ordinance to attempt to address the concerns and unique impacts such sites represent to a community. We researched industry expectations and looked to similar communities where sites are deployed for guidance in understanding the issues. We have diverse opinions and divergent views within our constituency. We studied and addressed the topic based on a few common ideas that we all share. We generally supported the roll out of small cell sites because it would aide and enhance our 911 locating and tracking abilities. With the prolific rise of 911 calls emanating from cellular devices, it will allow us to be better emergency responders and allow for better connectivity. There continues to be the need to be good stewards of our (ROW) to provide governing guidelines and acceptable means to implement that arrival. We also understand the need for consistency among utilities and timely response for approvals. Upon the submission of a complete application and approval of a master license agreement, we feel that 60 days is a reasonable time for approval. In order to achieve this timeline it is absolutely critical to allow local units of government to hire consultants to manage the permit process and that cost is directly attributable to the applicant. We are not staffed to handle this number of applications.

As mentioned above, the City of Edina set up a Master License Agreement with a telecommunications company enabling them to construct their system in the public ROW. We defer to Hennepin County and the State of Minnesota ROW governance when the site falls under those jurisdictions. The Master License Agreement addresses the general guidelines that need to be followed to place a telecommunication facility in the ROW. We require that the facility fits into the character of the neighborhood whether it is commercial or residential. We seek to guarantee that the site will not pose communications based interferences with our emergency response and other carriers. We seek to provide safe, mechanically sound and aesthetically pleasing sites for our community. We ensure to the public that the overall heights of poles within our ROW be consistent for their needs, while not being so aesthetically obtrusive for our constituents. We charge a nominal annual fee that covers maintenance of the light pole and costs associated with managing the ROW. These ROWs were dedicated to the public and would not be appealing to the telecommunications facilities if they didn't have transportation, electric and other amenities that make their installation and future maintenance feasible.

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We currently are processing 6 sites within our community from other telecommunication providers. We have declined Mobilitie's request for access to our ROW because their applications were incomplete. We would be happy to entertain their application as long as they can prove that they are a telecommunications company or a Contractor performing work for a telecommunications company and are willing to sign a Master License Agreement that identifies the design standards that are defined within our community. Every community has to answer to its constituents so we ask that each community and local authority be given the right to control and govern its ROW.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "BEO", is positioned above the typed name.

Brian E. Olson, P.E.  
Director of Public Works

A small, dark, horizontal redacted area is located to the right of the typed name.